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22 Attorneys for Defendants TANWEER AHMED  
23 AND M.Y. "MIKE" KHALAF

24 UNITED STATES DISTRICT COURT

25 NORTHERN DISTRICT OF CALIFORNIA

26 RENE ANGEL, et al.,

27 Case No. Case No. CV 11 1028 JSW

28 Plaintiffs,

STIPULATION RE: SETTLEMENT AND  
[PROPOSED] ORDER VACATING  
PRETRIAL CONFERENCE AND TRIAL  
DATES

NORTH COAST COURIERS, INC., et al.,

Defendants.

29 Plaintiffs Rene Angel, Marco Flores and David Martinez ("Plaintiffs") and Defendants  
30 Tanweer Ahmed and M.Y. "Mike" Khalaf ("Defendants") (collectively "the Parties"), by and  
31 through their respective counsel, hereby stipulate and agree as follows:

32 1. On February 1, 2012, this Court denied Defendants' Motion For Summary  
33 Judgment Or, In the Alternative, Summary Adjudication, and ordered the parties to return for a  
34 further settlement conference with the Honorable Magistrate Judge Laurel Beeler;

35 STIPULATION RE: SETTLEMENT AND  
36 [PROPOSED] ORDER VACATING  
37 PRETRIAL CONFERENCE & TRIAL DATES

2. On January 31, 2012, Littler Mendelson, counsel to Defendants filed a Motion To Withdraw as Counsel To Defendants and Request to Continue Pretrial and Trial Dates in this action, which was placed on the court's calendar for March 9, 2012;

3. On February 27, 2012, the Parties attended a settlement conference conducted by Magistrate Beeler and there entered into a confidential settlement of the action;

4. On March 5, 2012, the Parties stipulated to the removal from the Court's calendar of Littler Mendelson's Motion To Withdraw as Counsel to Defendants on grounds that the action had been settled;

5. On March 6, 2012, the Court adopted the stipulation and ordered the removal of Littler Mendelson's motion to withdraw from the Court's calendar;

6. The settlement reached on February 27, 2012, provides that the case shall be dismissed and judgment entered once Defendants have performed their obligations under the agreement. The parties anticipate that Defendants' performance will be complete in February.

7. There are two dates that remain on the Court's calendar. Those are the Pretrial Conference on April 16, 2012, and the Trial, which is set to commence on May 7, 2012. Because the settlement resolves all claims and defenses of the Parties, the parties stipulate and agree that the Pretrial Conference and Trial are no longer unnecessary and respectfully request that the Court vacate the Pretrial Conference and Trial dates.

Dated: April 10, 2012

## LAW OFFICES OF VICTOR C. THUESEN

By: /s/ Victor C. Thuesen  
Victor C. Thuesen

Attorneys for Plaintiffs

Dated: April 10, 2012

## LITTLER MENDELSON

By: /s/ Kai-Ching Cha  
Kai Ching Cha

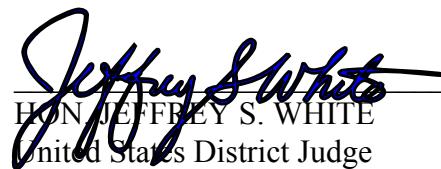
Attorneys for Defendants

1 **[PROPOSED] ORDER**

2 The Court adopts the Stipulation of the Parties and hereby vacates the Pretrial Conference  
3 date of April 16, 2012 and the Trial date of May 7, 2012. The Court SETS a case management  
4 conference for March 8, 2013 at 1:130 p.m. The case management conference will be vacated if the  
5 ~~PURSUANT TO STIPULATION IT IS SO ORDERED~~  
this action is dismissed before March 8, 2013 date. IT IS SO ORDERED.

6 DATED: April 11, 2012

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8 HON. JEFFREY S. WHITE  
United States District Judge

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